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**VIA ECF**

The Honorable Joanna Seybert  
United States District Judge  
U.S.D.C., Eastern District of New York  
100 Federal Plaza, Courtroom 1030  
Central Islip, NY 11722

Re: *In re Hain Celestial Heavy Metals Baby Food Litigation*, Case No. 2:21-cv-678-JS-AYS  
Request for Consolidation of Related Case

Dear Judge Seybert:

I represent Defendant The Hain Celestial Group, Inc. in the above-referenced action. I write to notify the Court of the filing of *Boulware v. Hain Celestial Group, Inc.*, Case No. 2:21-cv-3511, which asserts “consumer protection type claims” against Hain Celestial and not against any other defendant. A copy of the complaint is attached as Exhibit A.

Pursuant to the Court’s order consolidating all similar consumer fraud actions against Hain Celestial into a single Consolidated Action (ECF No. 47), Hain Celestial respectfully requests that the *Boulware* action—which post-dates the filing of the *Stewart* plaintiffs’ motion for consolidation—be consolidated into the Consolidated Action.

Respectfully submitted,

/s/ Dean N. Panos  
Dean N. Panos